

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

)	
In the Matter of an Arbitration Between:)	
PT SUMOHADIWIDJOJO,)	CIVIL ACTION NO. 04 12646 NG
)	
Applicant and)	RESPONDENT’S MOTION FOR LEAVE TO
Counterclaim Defendant)	FILE A REPLY MEMORANDUM IN
(Respondent below))	SUPPORT OF RESPONDENT’S MOTION
and)	TO STAY CONFIRMATION AND
)	ENFORCEMENT OF THE SIAC AWARD
BSB RESIDUAL ASSETS TRUST,)	
BSB TRUST COMPANY, LTD., Trustee,)	
)	
Respondent and)	
Counterclaim Plaintiff)	
(Claimant below).)	
)	
CITIZENS BANK)	
)	
Trustee)	
)	

Respondent BSB Residual Assets Trust and BSB Trust Company, Ltd., Trustee (together “BSB”) hereby moves, pursuant to Local Rule 7.1(B)(3), for leave to submit the accompanying Respondent’s Reply Memorandum in Support of Respondent’s Motion to Stay Confirmation and Enforcement of the SIAC Award (“Reply Memorandum”).

As grounds for this motion, BSB states that Applicant PT Sumohadiwidjojo has stipulated that BSB may file a Reply Memorandum. BSB further submits that the arguments contained in the Reply Memorandum will assist the Court in deciding the issues raised by BSB’s pending motion.

Respectfully submitted,

BSB RESIDUAL ASSETS TRUST
AND BSB TRUST COMPANY, LTD.,
TRUSTEE, Respondent and Counterclaim Plaintiff

By its attorneys,

/s/ Mark C. Fleming
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